

DAVID COOPER
PLAINTIFF,

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CASE NO 2:06-CV-418-MHT

LEORA P. JACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

DR. NICHOLS, et al,
DEFENDANTS

PLAINTIFF, RESPONDING TO AFFIDAVIT OF DONNA COVEY, LPN,

Comes now, the plaintiff, pro se, in the above style manner
Pursuant to F.R. Civ-p. 56, plaintiff, responding to affidavit
of Donna Covey LPN, plaintiff states that he will take a
oath at jury trial.

1. Plaintiff, doesn't denied this statement.
2. Plaintiff, doesn't denied this statement
3. Plaintiff, doesn't denied this statement.
4. Plaintiff, doesn't denied the first paragraph, but do denied
the second paragraph regarding sick-call in the housing
unit. See exhibit-18.
5. Plaintiff, doesn't denied this statement.
6. Plaintiff, doesn't denied this statement.
7. Plaintiff, denied that nurse Rosie Curum, RN completed
any medical physical on plaintiff, plaintiff, denied that
he have problem voiding any situation. Plaintiff
denied he have abrasion on his left arm, and that he
doesn't have his glasses with him and that they are at the
city jail in his property. Plaintiff, denied that he have
palpitations sometimes see exhibit-68, plaintiff, also
states that his prostate problem has turn into prostate

Hypertroph Center see exhibit 1-3, 4,

8. Plaintiff state that nurse Burkett, and nurse Dees, on April 9, 2006 give Plaintiff, his medication and DR. Nichols wasn't there,
9. Plaintiff, denied this statement and that there wasn't any X-ray see exhibit 4, clearly showing no signature on it.
10. Plaintiff, denied this statement.
11. Plaintiff, denied this statement also see exhibit K, maximum exposure, nurse Williams has damaged her credibility,
12. Plaintiff, denied this statement it was an nurse who gave me this medication and it didn't take two minutes,
13. Plaintiff, denied telling DR. Nichols he was going to have his third heart surgery on April 6, 2006, because he was arrested on April 6, 2006. Plaintiff also states he have had approximately (5) five heart failure in elton m.d. previously. See exhibit 14, no signature, it never happen I don't remember ever having X-ray here,
14. Plaintiff doesn't denied this statement,
15. Plaintiff totally agree with DR. Sanders,
16. Plaintiff, denied that he ever denied medical treatment and nurse Couey LPN, has perjury herself like the rest of the defendants, see ~~exhibit 14~~ also paragraph three stating Plaintiff only sick-cell that Plaintiff completed, also see exhibit 1, 2, on filed in this Court, and Plaintiff, says the first paragraph is totally deception, these people should be charge with perjury, and obstruction of Justice,
17. Plaintiff, denied this statement see exhibit 1-2 on filed at Court,

18. plaintiff, states that his Prostate Hypertroph Cancer medication was Stop on 5-11-06, and he filed a Grievance on 5-13-06 See exhibit 15 and 17 Regarding the entire issue also see 15, showing that as of 5-15-06, medication still haven't been received from medical, plaintiff further states that nurse Coney Lpm, has just perjury her self again stating that i was receiving medication as of 5-15-06, Commenced when exhibit-15 clearly shows and plainly that plaintiff, haven't receive his medication as of yet,
19. Plaintiff, denied this statement, see exhibit-3, 4, and exhibit-5 thru 10,
20. plaintiff, denied this statement.
21. plaintiff, states that see exhibit-3, 4, and exhibit-5 thru 10,

Date 8-9-06,
Danie Cooper, 7743
m.c.d.f.,
P.O. Box 4599
montg, AL 36195